

1 JASON M. FRIERSON  
2 United States Attorney  
3 District of Nevada  
Nevada Bar No. 7709  
4 VIRGINIA T. TOMOVA  
Assistant United States Attorney  
Nevada Bar Number 12504  
5 501 Las Vegas Blvd. So., Suite 1100  
Las Vegas, Nevada 89101  
(702) 388-6336  
6 [Virginia.Tomova@usdoj.gov](mailto:Virginia.Tomova@usdoj.gov)

7 *Attorneys for the United States of America*

8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 KIM LISA HEATH,  
11 Plaintiff,  
12 v.  
13 UNITED STATES OF AMERICA,  
14 Defendant.

Case No. 2:24-cv-00155-CDS-BNW  
**Stipulation and Order to Extend Time  
to File a Response to Plaintiff's First  
Amended Complaint**  
**(Second Request)**

15 Plaintiff Kim Lisa Heath and Defendant United States of America ("United  
16 States"), through undersigned counsel, hereby submit this stipulation to extend the date to  
17 file a responsive pleading.

18 Plaintiff filed her Complaint on January 23, 2024.

19 Plaintiff filed her First Amended Complaint on March 1, 2024.

20 The United States was served with Plaintiff's First Amended Complaint on March  
21 12, 2024.

22 The current deadline for the United States to respond to Plaintiffs' First Amended  
23 Complaint is June 13, 2024.

24 Plaintiff and the United States, through undersigned counsel, agree and stipulate  
25 that the United States' time to respond to the Plaintiff's First Amended Complaint be  
26 extended to July 8, 2024. This is the second request for an extension of time.

27 The extension of time is necessary because Federal Defendant is still in the process  
28 of gathering necessary information from the Department of Veterans Affairs, which is

1 currently undergoing significant staffing shortages and high workloads that have delayed  
2 Federal Defendant's ability to comprehensively evaluate and answer Plaintiff's claims.

3 Therefore, the parties request that the Court extend the deadline for the United States  
4 to answer or otherwise respond to Plaintiff's First Amended Complaint to July 8, 2024.

5 This stipulated request is filed in good faith and not for the purposes of undue delay.

6 Respectfully submitted this 13th day of June 2024.

7 THE COTTLE LAW FIRM

8 /s/ Robert W. Cottle, Esq.

9 ROBERT W. COTTLE, ESQ.  
Nevada Bar No. 4576  
10 HAYDEN R. COTTLE, ESQ.  
Nevada Bar No. 16219  
11 8635 South Eastern Ave.  
Las Vegas, Nevada 89123

12 *Attorneys for Plaintiff*

U.S. ATTORNEY'S OFFICE

JASON M. FRIERSON  
United States Attorney

/s/ Virginia T. Tomova  
VIRGINIA T. TOMOVA  
Assistant United States Attorney  
501 South Las Vegas Blvd., Suite #1100  
Las Vegas, Nevada 89101

*Attorneys for the United States*

14 **IT IS SO ORDERED:**

15   
16 **UNITED STATES MAGISTRATE JUDGE**

17 **DATED:** 6/14/2024

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